



Driving progress  
through partnership

Jordan W. Siev

Direct Phone: +1 212 205 6085

Email: jsiev@reedsmith.com

Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650  
+1 212 521 5400  
Fax +1 212 521 5450  
reedsmith.com

October 8, 2020

**Via ECF**

The Hon. Lorna G. Schofield  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *In re Application of Daniel Snyder for an Order Directing Discovery from  
The Ardent Group, LLC Pursuant to 28 U.S.C. § 1782 (Misc. Action No. 1:20-mc-00323)***

Dear Judge Schofield,

We represent petitioner Daniel Snyder ("Mr. Snyder") in the above-captioned *ex parte* action seeking discovery in aid of foreign litigation, pursuant to 28 U.S.C. Section 1782 (the "Application"). We write to provide the Court with an update regarding the status of the Application and to advise the Court that Mr. Snyder intends to voluntarily dismiss the Application without prejudice, as detailed below.

After commencing this action, I spoke and emailed with counsel for respondent The Ardent Group, LLC ("Respondent") on several occasions. During those conversations, Respondent's counsel informed me that, despite the fact that Respondent's website listed Respondent's primary business address as 450 Park Avenue South, 3rd Floor, New York, New York 10016 (*see* p. 3 of Exhibit I to the Declaration of Jordan Siev, dated September 15, 2020, Dkt. No. 3), this information was incorrect, and that Respondent is now located solely in The Woodlands, Texas. Respondent has subsequently updated its website to correct its prior mistake.

In light of this new information, Mr. Snyder is withdrawing his request for assistance from this Court, and will re-file his Application in the United States District Court for the Southern District of Texas, the district in which Respondent has represented to us that it currently resides. Mr. Snyder's Notice of Voluntary Dismissal without Prejudice is being filed concurrently herewith. Counsel for Respondent has confirmed to us that he will accept service of the papers on behalf of his client upon refileing the action in the Southern District of Texas.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jordan W. Siev